REMARKS

A. The Section 103 Rejections

Claims 1, 4-9, 12-17 and 20-24 were rejected under 35 U.S.C. §103(a) based on the combination of Deshpande, U.S. Patent Publication No. 2005/0071881 ("Deshpande") in view of an article authored by Schulzrinne et al ("Schulzrinne") and in further view of newly cited U.S. Patent Application Publication No. 2003/0018615 to Chaudhuri et al. ("Chaudhuri") and newly cited U.S. Patent No. 6,741,996 to Brenchner et al ("Brenchner"). Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Of the rejected claims, claims 1, 9 and 17 are independent claims. It is to these claims that Applicants now turn, it being understood that the remarks which follow apply to claims 4-8, 12-16 and 20-24 because these claims depend on claim 1, 9 or 17, respectively.

Claims 1, 9 and 17 each include the features of (1) receiving a Real-Time Streaming Protocol (RTSP)-compliant PLAYLIST_PLAY navigation message, that includes at least one (n+1) tuple, multidimensional pointer, where (2) said multidimensional pointer is associated with a media clip in a depository of digital multimedia content that is organized into a nested hierarchical arrangement having a plurality of levels that correspond to respective media identifier dimensions of said RTSP multidimensional pointer.

(a) the navigation message feature

In the Office Action the Examiner appears to take the position that because Deshpande's RTSP PLAY request message includes an "*npt* time value to indicate when to playback each video segment or when to switch to the next video segment" that such a message is the same as, or suggestive of, the claimed navigation message. Applicants disagree.

Deshpande does not describe its *npt* values as indicating when to playback each video segment or when to switch to a next video segment as the Examiner alleges. To the contrary, Deshpande describes the *npt* values as an indication of an amount of video that is to be played back. For example, an *npt* value is equal to "St1-Et1" where St1 and Et1 are "timecode values" that "represent beginning and ending timecode values" for a video segment (*see* Deshpande paragraphs [104] through [0108]). Thus, in Deshpande, each RTSP PLAY request message appears to contain an *npt* value that indicates an amount of video (i.e., segment) that is to be playbacked. Further, Deshpande appears to disclose that after receipt of such a message containing an *npt* value, and after an amount of video is buffered, video playback of the segment represented by the *npt* value is started. According to Deshpande, this process is repeated for each each subsequent video segment.

At no time, however, does Deshpande describe the use of the *npt* values as being navigation messages as in the claims, or indicating *skipping* to a new clip or *switching* to a new playlist, two examples of a navigation message given in the instant specification (see page 14, lines 16-17).

In sum, one of ordinary skill in the art would not interpret Deshpande's *npt* time values as being the same as, or suggestive of, the claimed navigation message.

(b) the (n+1) tuple, multi-dimensional pointer feature

In the Office Action the Examiner appears to acknowledge that the combination of Deshpande and Schulzrinne fails to disclose or suggest the claimed "(n+1) tuple, multidimensional pointer". To make up for this deficiency the Examiner now relies upon Chaudhuri.

In the specification a “multi-dimensional pointer” is described on page 14, lines 20-21 of the specification as, for example, “a 3-tuple pointer parameter” that includes “an effective time...as a timing parameter”.

In contrast, Chaudhuri's "n-tuple" samples are unrelated to a 3-tuple *pointer* of any kind whatsoever, much less the claimed pointer. Yet further, Chaudhuri's n-tuple samples do not appear to include a timing parameter.

In sum, one of ordinary skill in the art would not interpret Chaudhuri's n-tuple samples as being the same as, or suggestive of, the claimed (n+1)tuple, multi-dimensional pointer.

(c) the nested hierarchical arrangement feature

In the Office Action the Examiner appears to acknowledge that the combination of Deshpande, Schulzrinne and Chaudhuri fails to disclose or suggest a "depository of digital multimedia content [that] is organized into a nested hierarchical arrangement *having a plurality of levels that correspond to respective media identifier dimensions of said RTSP multidimensional pointer*".

To make up for this deficiency the Examiner appears to rely upon Brenchner. Applicants disagree.

Brenchner appears to describe a generalized "collection heirarchy" where the hierarchy is made up of "content folders" that appear to relate to media clips. At no time, however, does Brenchner describe the collection hierarchy or content folders as including *a plurality of levels that correspond to respective media identifier dimensions of an RTSP multidimensional pointer.*

Though Examiners may interpret claims broadly, any such interpretation must be consistent with the specification. Interpreting Brenchner's collection hierarchy as being akin to the claimed depository of digital multimedia content that is organized into a nested hierarchical arrangement having a plurality of levels that correspond to respective media identifier dimensions of said RTSP multidimensional pointer, is inconsistent with the present specification, and, therefore, impermissible.

In support of their position the Applicants refer the Examiner to an example of the claimed nested hierarchical arrangement, shown in Fig. 6B of the present application. Such an arrangement is not disclosed or suggested by Brencher's collection hierarchy.

B. New Claims 25-27

Each of dependent claims 25-27 includes the feature of a "Real-Time Streaming Protocol (RTSP)-compliant PLAYLIST_PLAY navigation message... comprising a 3-tuple of a playlist URL, clip index and a relative time offset".

The Applicants submit that the combination of Deshpande, Schulzrinne,

Chaudhuri and Brenchner does not disclose or suggest the features of claims 25-27.

Conclusion:

Accordingly, the Applicants submit that the subject matter of claims 1, 4-9, 12-17 and 20-27 would not have been obvious at the time the instant application was filed based on the combined disclosures of Desphande, Schulzrinne, Chaudhuri and Brenchner. The Applicants respectfully request withdrawal of the pending rejections and allowance of claims 1, 4-9, 12-17 and 20-27.

Should there be any outstanding matters that need to be resolved in the present application the Examiner is respectfully requested to contact John E. Curtin at the telephone number listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 50-3777 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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